Table 2. Annual Agency Burden and Cost
NESHAP for Pulp and Paper Production
(40 CFR Part 63, Subpart S)

Burden Item	(A) Number of Respondents Per Year (a)		(B) EPA Hours Per Respondent	(C) Tech Hours Per Year @ $40.56 (C=AxB)	(D) Management Hours Per Year @ $54.66 (D=Cx0.05)	(E) Clerical Hours Per Year @ $21.95 (E=Cx0.1)	(F) EPA Cost Per Year
1. Applications							
2. Surveys and Studies							
3. Reporting Requirements							
A. Read and Understand Rule Requirements	7	b	6	42	2	4	$1,910
B. Required Activities							
Initial performance tests:							
1.1) Pulping processes (Non-Sulfite) - Choice of:							
a) Review Documentation that vent streams are introduced to the flame zone of a boiler, lime kiln, or recovery furnace, or	4	b,c	8	32	2	3	$1,456
b) Review documentation that the control incinerator is operating at a level of at least 1600 F and 0.75 sec residence time, or	1	b,d	8	8	0	1	$364
c) Review performance test of control device	1	b,d	8	8	0	1	$364
1.2) Pulping Processes (Sulfite) -Revew performance test of control device	0	b,e	8	0	0	0	$0
2.1) Bleaching process vent scrubber (MACT I Mills) - Choice of							
a) Review documentation of scrubber operating parameters	4	b,g	8	32	2	3	$1,456
b) Review performance test of control device	0	b,f	8	0	0	0	$0
2.2) Bleaching process vent scrubber (MACT III Mills) - Choice of							
a) Review documentation of scrubber operating parameters	0	b,g	8	0	0	0	$0
b) Review performance test of control device	0	b,f	8	0	1	0	$55
3.1) Pulping wastewater treatment system (Non-Sulfite) - Choice of:							
a) Review performance test of condensate segregation and control device, or	4	b,g	8	32	2	3	$1,456
b) Review performance test of biotreatment unit	2	b,g	8	16	1	2	$728
3.2) Pulping wastewater treatment (Sulfite) -Review performance test of control device	0	ɔ,g,h	8	0	0	0	$0
Review repeat performance tests							
1) test method 308 - pulping	0	b,i	4	0	0	0	$0
2) test method 26A - bleaching	0	b,i	4	0	1	1	$77
3) test method 305 - kraft pulping wastewater	1	b,i	4	4	0	0	$182
4) test method 304 - kraft pulping wastewater	0	b,i	4	0	0	0	$0
5) test method 305 - sulfite pulping wastewater	0	b,i	4	0	1	0	$55
Initial/Annual inspection (enclosures, closed vent, wastewater conveyance system) - test method 21	87	j	0	0	0	0	$0
Monthly visual inspection of enclosures, closed vent system, and wastewater conveyance system.	130	k	0	0	0	0	$0
C. Create Information							
D. Gather Information							
E. Report Preparation							
Review Initial Notification Report	0	b,k	4	0	0	0	$0
Review Notification of compliance status	0	b,k	4	0	0	0	$0
Review initial compliance strategy report	0	b,l	4	0	0	0	$0
Review compliance strategy report update	27	l	4	108	5	11	$4,913

Review Semi-annual summary report	137	k	2	274	14	27	$12,464
Review Continuous monitoring/Exceedance reports	21	m	8	168	8	17	$7,642
Review Notification of performance test	24	b,n	8	192	10	19	$8,734
Review Notification of construction/reconstruction	21	b,o	4	84	4	8	$3,821
Review Notification of actual startup	21	b,o	4	84	1	1	$3,484
4. Recordkeeping Requirements							
A. Read Instructions							
B. Plan Activities							
C. Implement Activities							
D. Develop Record System	0	b,k	0	0	0	0	$0
E. Record information							
Records of monitoring parameters	137	k	0	0	0	0	$0
Records of periodic inspections (monthly visual inspections and annual method 21)							
Record startups, shutdowns, and malfunctions	137	k	0	0	0	0	$0
F. Personnel Training	137	k	0	0	0	0	$0
G. Time for audits	137	k	0	0	0	0	$0
Total:				1084	54	102	$49,158

TOTAL FEDERAL GOVERNMENT BURDEN SUMMARY:

Total hours per year	1,240
Annual costs in dollars	$49,158

Footnotes

a Values are rounded to simplify calculations.
b One-time activity. After initial compliance date, assume that 5% of mills affected as a result of unexplained exceedances.
c Estimated that 66.7% of mills will use a recovery boiler, power boiler, or lime kiln for pulping lines. There are 122 non-sulfite pulping mills. (66.7% of 122 = 81).
d Estimated that 33.3% of mills will use incineration for pulping lines (16.7% will provide accepatble design specs (14), and 16.7% will conduct performance tests (14)).
e Assume that all of the 8 sulfite pulping mills will conduct performance tests.
f 94 MACT I category mills have bleaching lines. 90% will provide acceptable performance specs (85), 10% will conduct performance tests (9).
Assume 2 percent of stand-alone MACT III category mills have bleaching lines (2% of 338=7). 90% will provide performance specs of previous test results (6).
10% will conduct performance tests (1).
g Estimated that each kraft mill has one pulping wastewater control device. Of the 108 kraft mills, 28 already have steam strippers in use,
and of the 28, all are assumed to conduct condensate segregation and performance tests. Of the 80 mills without control, 35 will use biotreatment control, and 45 will install steam strippers.
Facilities installing new biotreatment control will perform initial performance tests.
h Estimated that each kraft mill has one pulping wastewater control device. Assumed 33% will use biotreatment. (33% of 108 = 36).
i Assumed that 15% of performance tests are failed and need to be repeated.
j Initial and annual activity by all affected mills. Assumed that EPA is notified each year of the testing. Assumed 2/3 of all MACT I mills have positive pressure points in their vent systems.
k Performed by all affected mills. (137)
l Performed by all kraft mills. (108)
m Assumed that 15% of all mills during any one quarter will be required to submit an exceedance report in addition to the summary report. (15% of 137 = 21)
n EPA must be notified of all tests including repeat performance tests. (130 x .05 = 7) (7 x 1.15 x 3 = 24)
o Assumed 15% of mills conduct construction or reconstruction per year. (15% of 130 = 21)